

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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NIKI ROBINSON and PATRICK TOMLINSON,

Plaintiffs,

v.

Case No. 24-CV-00264

CITY OF MILWAUKEE, LYNDON EVANS,  
CHRISTIAN GARRIDO, BRADLEY ORLANDO,  
NICOLE PLEVAK, JOHN KOHLER,  
JACOB WASECHEK, FIDAH MUSTAFA,  
NATHANIEL PETERSEN, SEAN CARLETON,  
and PAUL VENTO,

Defendants.

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**DEFENDANTS' MOTION TO SEAL EXHIBIT A**

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NOW COME Defendants, Fidah Mustafa, John Kohler, Nicole Plevak, Bradley Orlando, Nathaniel Petersen, Sean Carleton, Christian Garrido, City of Milwaukee, Lyndon Evans, Paul Vento, and Jacob Wasechek, by counsel, Evan C. Goyke, City Attorney, by William Hotchkiss, Assistant City Attorney, pursuant to General L.R. 79 moves the Court to seal Exhibit A – Police Reports (attached to Defendants' Brief in Support of Motion to Dismiss), based upon the following grounds:

1. On August 1<sup>st</sup>, 2024, in support of Defendants' Motion to Dismiss, Defendants attached relevant police reports.
2. The circumstances, as apparent in Plaintiff's complaint and amended complaint, regarding Plaintiff's case stem from seemingly anonymous actors using information about Plaintiff's circumstances in a continued effort of harassment.

3. While the police reports have been redacted, Defendants seek to seal their disclosure to case participants out of an abundance of caution, and to prevent these anonymous actors from more information regarding Plaintiff, Defendants, and the underlying facts of the ongoing legal dispute.

4. Immediate sealing and suppression of this document will not prejudice Plaintiff, will not interfere with the court's adjudication of the above action, and is warranted given the unique circumstances.

5. For these reasons, Defendants request that the court find good cause to seal Exhibit A of Defendants' Motion to Dismiss.

Dated and signed at Milwaukee, Wisconsin this 2<sup>nd</sup> day of August, 2024.

EVAN C. GOYKE  
City Attorney

s/ William Hotchkiss  
WILLIAM HOTCHKISS  
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